

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHWEST ADMINISTRATORS,
INC.,

Plaintiff,

v.

MONDELEZ GLOBAL LLC, a Delaware
limited liability company,

Defendant.

NO. C21-01496-RSM

STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE

THE PARTIES above named, through their attorneys Russell J. Reid of Reid, McCarthy, Ballew & Leahy, L.L.P., attorneys for Plaintiff, and Charles B. Jellinek of Bryan Cave Leighton Paisner LLP and Steffanie M. Fain, Jeffrey E. Bilanko and Susan K. Kaplan of Carroll, Biddle & Bilanko, PLLC, attorneys for Defendant, Mondelez Global LLC, hereby stipulate that the above-referenced action should be dismissed, with prejudice, and with each party bearing its own attorneys' fees and costs. This Stipulation shall not foreclose Plaintiff or the Trust, based on res judicata principles or other legal principles, from collecting additional contributions, liquidated damages, interest and attorney's fees for the time period encompassed by this action, September 2021 through November 2021, if a future audit or some other source reveals that

Defendant owes the Plaintiff additional amounts for said period, or from collecting contributions, liquidated damages, interest, attorney's fees and costs for any period other than September 2021 through November 2021.

DATED this 4th day of February, 2022.

REID, McCARTHY, BALLEW & LEAHY,
L.L.P.

By: s/Russell J. Reid

Russell J. Reid, WSBA #2560
100 West Harrison Street, N. Tower, #300
Seattle WA 98119
Telephone: (206) 285-0464
Fax: (206) 285-8925
Email: rjr@rmbllaw.com

Attorney for Plaintiff

BRYAN CAVE LEIGHTON PAISNER
LLP

By: s/Charles B. Jellinek, Authorized
to sign by email of 2/7/22

Charles B. Jellinek, *pro hac vice*
211 North Broadway, Suite 3600
St. Louis Missouri 63102
Telephone: (314) 259-2138
Fax: (314) 552-8138
Email: cbjellinek@bclplaw.com

Attorney for Defendant

CARROLL, BIDDLE & BILANKO,
PLLC

By: s/Steffanie m. Fain, Authorized to
sign per email 2/7/22

Steffanie M. Fain, WSBA #42973
Jeffrey E. Bilanko, WSBA #38829
Susan K. Kaplan, WSBA #40985
1000 2nd Avenue, Suite 3100
Seattle WA 98104
Telephone: (206) 338-1526
Email: sfain@cbblegal.com
Email: jbilanko@cbblegal.com
Email: skaplan@cbblegal.com

Attorneys for Defendant

ORDER OF DISMISSAL

Based on the foregoing Stipulation of Plaintiff and Defendant,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that this action shall be and is hereby dismissed with prejudice and that each party shall bear its own attorney's fees and costs of suit. This Order shall not foreclose Plaintiff or the Trust, based on res judicata principles or other legal principles, from collecting additional contributions, liquidated damages, interest and attorneys fees for the time period encompassed by this action, September 2021 through November 2021, if a future audit or some other source reveals that Defendant owes the Plaintiff additional amounts for said period, or from collecting contributions, liquidated damages, interest, attorney's fees and costs for any period other than September 2021 through November 2021.

ORDER ENTERED this 8th day of February, 2022.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Submitted for Entry:

REID, McCARTHY, BALLEW & LEAHY, L.L.P.

By: s/Russell J. Reid

Russell J. Reid, WSBA #2560

100 West Harrison Street, N. Tower, #300

Seattle WA 98119

Telephone: (206) 285-0464

Fax: (206) 285-8925

Email: rjr@rmbllaw.com

Attorney for Plaintiff